

AMERI LAW FIRM

Attorneys At Law

February 27, 2024

Via Electronic Filing:

The Honorable Andrew L. Carter, Jr., U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 1306
New York, New York 10007

RE: Scott et al. v. AAM Holding Corp. et al.
Case No.: 1:23-cv-01909-ALC

Dear Honorable Judge Carter:

As your Honor is aware this firm represents the Plaintiffs in the above referenced matter. This correspondence is being sent as a status update on three specific issues:

1. Prior Counsels failure to sign a substitution of counsel and accept their termination;
2. Whether Plaintiffs consent to arbitration or will Defendants move for arbitration and establish a briefing schedule;

As it relates to number one, prior counsel has failed to send a copy of a substitution of counsel yet on this matter. Instead, he continues to reach out to the Plaintiffs. The correspondence sent to prior counsel and uploaded to this Court clearly indicates his termination.

To avoid unnecessary legal expenditures, we ask the Court to So Order that Plaintiffs' counsel Jason Mizrahi and his firm are hereby terminated as counsel for Plaintiffs and the Ameri Law Firm is hereby substituted in their stead.

As it relates to the briefing schedule, Plaintiffs oppose Defendants request for arbitration and have analyzed Defendants' position and find it defensible. Plaintiff and Defendants counsel have discussed if the parties wish to attend mediation prior to briefing the issue. Defendants do not have authorization for the same and seek to consult their clients, if accepted, we ask the Court to stay the briefing schedule subject to mediation or informal settlement negotiations. Accordingly, the Parties respectfully request until March 8, 2024, to advise the Court whether the Parties would

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like to Court to set a briefing schedule for Defendants' motion to compel arbitration or whether the Parties request that the case be stayed pending mediation or informal settlement negotiations.

Respectfully Submitted,
AMERI LAW FIRM, LLC

/s/ Nima Ameri
Nima Ameri, Esq.

CC: All Counsel of Record

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